



OFFICE OF THE DISTRICT ATTORNEY  
RICHMOND COUNTY

MICHAEL E. McMAHON  
DISTRICT ATTORNEY

[ADA NAME]  
ASSISTANT DISTRICT ATTORNEY  
718.556.[ADA EXT.]

August 24, 2021

Re: [REDACTED]

Dear Counselor,

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosures:

The People are not aware of any disclosures for Officer Salvatore Persico.

The People are providing the following allegations and dispositions against Officer to the Court for an in-camera inspection.

A review of the Central Personnel Index (CPI) for Officer revealed the following:

1. On July 20, 2018, Officer John Salerno received allegations for a disputed arrest, FADO force-Physical Force, Force -other force, and damage to complainant's property – not vouchered. They were exonerated from these allegations and no action was taken.

The People will move in limine to disclose same to the defense, will move to preclude reference by the defense to the above information, and will otherwise object to its use or introduction into evidence during trial

The People are aware that during the time he has been employed by the New York City Police Department, Police Officer John Salerno has been named as a defendant or co-defendant in a federal civil lawsuit. 1. Pierre v. City of New York, et al., 18-cv-07210 (DLI) (JO) – filed in the Eastern District of New York, settled for \$5,000 in 2019, without any admission of fault or liability by the defendants. In the cases that settled, a stipulation of settlement and order of dismissal with prejudice was filed with the respective court, indicating, in sum and substance, that nothing in the settlement shall be construed as an admission or concession of liability by any of the defendants

or the City of New York regarding any of the allegations made by the plaintiffs in their complaints, or that any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.

For information about this officer's CCRB history, if any, please visit: <https://www1.nyc.gov/site/ccrb/policy/MOS-records.page>.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at (718) 556-3258 during office hours.

Sincerely,

\_\_Taylor Goodspeed\_\_  
Taylor Goodspeed  
*Assistant District Attorney*

cc: Clerk of the Court